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*Attorneys for Debtors and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DEBTORS' AND SHAREHOLDER  
PROONENTS' SUBMISSION OF  
ARGUMENT DEMONSTRATIVE  
REGARDING CLASS 10A-II**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

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1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in  
2 possession in the above-captioned chapter 11 cases, and certain funds and accounts managed or  
3 advised by Abrams Capital Management, LP, and certain funds and accounts managed or advised  
4 by Knighthood Capital Management, LLC each as Plan Proponents submit the demonstrative  
5 document discussed at the hearing held on June 3, 2020, attached hereto as Exhibit A.

6  
7 Dated: June 3, 2020

WEIL, GOTSHAL & MANGES LLP  
KELLER BENVENUTTI KIM LLP

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9 By: /s/ Stephen Karotkin  
10 Stephen Karotkin

11 *Attorneys for the Debtors and*  
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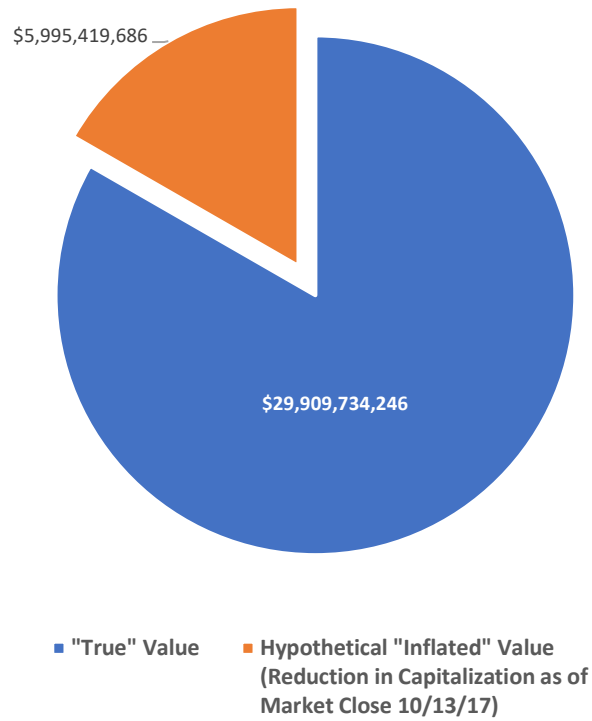
# **EXHIBIT A**

# PG&E Market Capitalization

## Pre-Disclosure Capitalization

\$35,905,153,932

Market Open 10/12/17

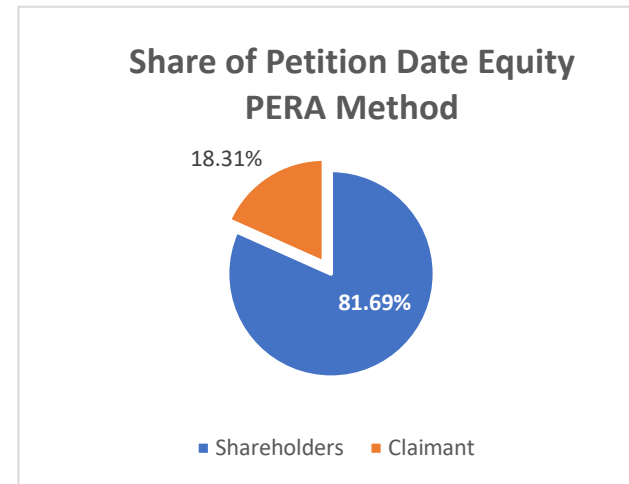
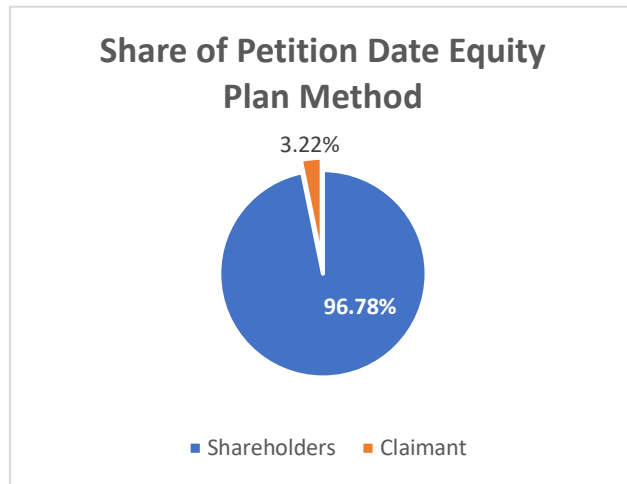


## Petition Date Capitalization

Market Close 1/29/19



# Treatment of Hypothetical Claimant



## Claimant

- Buys 100,000,000 shares on October 12, 2017, at \$69.29 per share (opening price for the day), for a total purchase price of \$6,929,000,000.
- Sells all 100,000,000 shares on October 13, 2017, at \$57.72 per share (closing price for the day), for a total sale price of \$5,772,000,000.
- Assuming fraud claims are proven, damages are \$1,157,000,000 – roughly 3.22% of PG&E's market capitalization at the time of investment.

The Plan: Claimant receives  $\cong$  3.22% of the number of common shares outstanding on the Petition Date.

PERA Methodology: Claimant receives  $\cong$  18.31% of outstanding common shares ***despite having lost only  $\cong$  3.22% of market capitalization as of the time of investment.***